

Carryforward of Credit From Form 8884

Announcement 2005-79

Form 8884, *New York Liberty Zone Business Employee Credit*, is obsolete for tax years beginning after December 31, 2004. As a result, any carryforward of this credit to tax years beginning after 2004 will be reported on **Form 8835**, *Renewable Electricity, Refined Coal, and Indian Coal Production Credit*. The credit carryforward to 2005 is the excess of line 10 of the 2004 Form 8884 over line 23 of that form, to the extent not used in carrying back the credit. For tax years beginning in 2005, the credit carryforward is reported on Form 8835, Section B, line 28. See the 2005 Form 8835 for details on how to report this carryforward.

IRS and The George Washington University Law School To Sponsor Institute on International Tax Issues

Announcement 2005-81

The Internal Revenue Service announces the Eighteenth Annual Institute on Current Issues in International Taxation, jointly sponsored by the Internal Revenue Service and The George Washington University Law School, to be held on December 8 and 9, 2005, at the J.W. Marriott Hotel in Washington, DC. Registration is currently underway for the Institute, which is intended for international tax professionals.

The program will present a unique opportunity for top IRS and Treasury officials and tax experts, and leading private sector specialists, to address breaking issues and present key perspectives on new developments. The first day will feature sessions on the following:

- Current Competent Authority Issues;
- Intellectual Priority Issues;
- Foreign Tax Credits;
- Financially Troubled International Ventures;
- Dual Consolidated Losses/Arbitrage Issues; and
- Updates on Outbound Issues.

The Honorable Donald L. Korb, Chief Counsel, Internal Revenue Service, will deliver the luncheon address.

The second day will focus on the following topics:

- Latest IRS Transfer Pricing Guidance;
- Real world Advice on Transfer Pricing;
- Updates on Inbound Issues; and
- Circular 230/Tax Shelter/Ethics.

The second day will also include an "Ask the IRS" panel featuring senior officials from the Service.

Those interested in attending or obtaining more information should contact The George Washington University Law School, at <http://www.law.gwu.edu/ciit>.

Deletions From Cumulative List of Organizations Contributions to Which are Deductible Under Section 170 of the Code

Announcement 2005-82

The names of organizations that no longer qualify as organizations described in section 170(c)(2) of the Internal Revenue Code of 1986 are listed below.

Generally, the Service will not disallow deductions for contributions made to a listed organization on or before the date of announcement in the Internal Revenue Bulletin that an organization no longer qualifies. However, the Service is not precluded from disallowing a deduction for any contributions made after an organization ceases to qualify under section 170(c)(2) if the organization has not timely filed a suit for declaratory judgment under section 7428 and if the contributor (1) had knowledge of the revocation of the ruling or determination letter, (2) was aware that such revocation was imminent, or (3) was in part responsible for or was aware of the activities or omissions of the organization that brought about this revocation.

If on the other hand a suit for declaratory judgment has been timely filed, contributions from individuals and organizations described in section 170(c)(2) that are otherwise allowable will continue to be deductible. Protection under section 7428(c) would begin on November 7,

2005, and would end on the date the court first determines that the organization is not described in section 170(c)(2) as more particularly set forth in section 7428(c)(1). For individual contributors, the maximum deduction protected is \$1,000, with a husband and wife treated as one contributor. This benefit is not extended to any individual, in whole or in part, for the acts or omissions of the organization that were the basis for revocation.

Delta Regional Transit System, Inc.
Greenville, MS

Gibson Trust, Inc. Hollywood, FL

Housing Development Group, Inc.
Providence, RI

National Credit Education and Review
Canton, MI

Foundations Status of Certain Organizations

Announcement 2005-83

The following organizations have failed to establish or have been unable to maintain their status as public charities or as operating foundations. Accordingly, grantors and contributors may not, after this date, rely on previous rulings or designations in the Cumulative List of Organizations (Publication 78), or on the presumption arising from the filing of notices under section 508(b) of the Code. This listing does *not* indicate that the organizations have lost their status as organizations described in section 501(c)(3), eligible to receive deductible contributions.

Former Public Charities. The following organizations (which have been treated as organizations that are not private foundations described in section 509(a) of the Code) are now classified as private foundations:

4-Scor, Inc., Saylorsburg, PA
ABZ Art Foundation, Inc., New York, NY
Africana Literature Archives, Inc.,
New York, NY
Albemarle Fire Safety Committee,
Elizabeth City, NC
All-Sports Hall of Fame Charitable
Foundation, Inc., New York, NY